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UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION

RICARDO ANGEL NAVARRETTE and)
 KELLY KASLAR,)
)
 Plaintiffs,)
)
 v.)
)
 UNITED STATES OF AMERICA,)
)
 Defendant.)
 _____)

Case No. CV 04-0760 JSW

**STIPULATION AND
 JOINT MOTION TO EXTEND
 DEADLINES FOR COMPLETION
 OF MEDIATION AND EXPERT
 DISCOVERY; ~~PROPOSED~~
 ORDER**

Subject to this Court's approval, plaintiff, Ricardo Angel Navarrette, and defendant, the United States of America, by and through their undersigned counsel, hereby stipulate and agree to continue the deadlines for completion of expert discovery and the further court-connected

STIPULATION AND JOINT MOTION TO EXTEND DEADLINE FOR COMPLETION OF MEDIATION AND EXPERT DISCOVERY
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1 mediation. This Federal Tort Claims Act case is currently set for bench trial beginning on April
2 27, 2009. The pre-trial conference will take place on April 6, 2009. This request will cause no
3 change to the pre-trial conference date or the trial date.

4 The parties have completed factual discovery. The additional time is necessary to allow
5 the parties to conduct the depositions of expert witnesses. One of plaintiff's experts, Dr. Alex
6 Battaglia, is currently out of the country on sabbatical. Defendant intends to conduct his
7 deposition upon his return to the United States in early January. Plaintiff's expert, Lisa
8 Davidson, Ph.D., was unable to complete her report prior to November 17, 2008, the date on
9 which defendant noticed her deposition. Defendant has re-scheduled her deposition for January
10 12, 2009. Plaintiff also intends to conduct the depositions of defendant's experts, William
11 Hooker, Ph.D., Andrew O'Brien, and Margo Ogus.

12 In the absence of expert testimony, the parties agreed that they lacked sufficient
13 information to engage in a meaningful mediation session. The parties conferred with the
14 mediator, Christopher Johns, and scheduled a further mediation session for January 28, 2009.

15 The parties therefore jointly request that the Court extend the deadline for the completion
16 of expert discovery from December 5, 2009 until February 27, 2009, and the deadline for the
17 completion of further court-connected mediation from November 24, 2008, until February 27,
18 2009.

19 **IT IS SO STIPULATED.**

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27 STIPULATION AND JOINT MOTION TO EXTEND DEADLINE FOR COMPLETION OF MEDIATION AND
28 EXPERT DISCOVERY

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1 Dated: November 24, 2008

2 Respectfully submitted,

3 JOSEPH RUSSONIELLO
4 United States Attorney

5 By: /s/
6 ELLEN M. FITZGERALD
7 Assistant United States Attorney
8 Attorney for Defendant

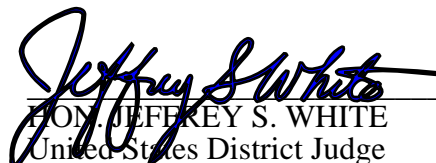
9 BOZMAN-MOSS & WATSON

10 By: /s/
11 BARBARA BOZMAN-MOSS
12 Attorney for Plaintiff

13 **APPROVED AND SO ORDERED.**

14 The Court hereby extends the deadline for the completion of expert discovery until
15 February 27, 2009, and the deadline for completion of further court-connected mediation until
16 February 27, 2009. All other dates are to remain the same.

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18 DATED: November 25, 2008

19 
20 HON. JEFFREY S. WHITE
21 United States District Judge
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27 STIPULATION AND JOINT MOTION TO EXTEND DEADLINE FOR COMPLETION OF MEDIATION AND
28 EXPERT DISCOVERY
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